

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ABDULRAHMAN ALHARBI,

Plaintiff,

– v. –

GLENN BECK; THE BLAZE, INC.;
MERCURY RADIO ARTS, INC.; AND
PREMIERE RADIO NETWORKS, INC.,

Defendants.

CIVIL ACTION NO.
1:14-cv-11550-PBS

MOTION FOR LEAVE TO FILE REPLY

Pursuant to Local Rule 7.1(B)(3), Defendants Glenn Beck, TheBlaze Inc. (erroneously sued herein as “The Blaze, Inc.”), Mercury Radio Arts, Inc., and Premiere Radio Networks, Inc. (together, “Defendants”) request leave of this Court to file, by June 30, 2014, a reply to Plaintiff Abdulrahman Alharbi’s (“Plaintiff”) Opposition to Defendants’ Motion to Dismiss the Complaint Pursuant to Fed. R. Civ. P. 12(b)(6) that is no more than ten pages in length. *Plaintiff does not object to the filing of this Motion.* In further support of its request, Defendants state as follows:

1. On March 28, 2014, Plaintiff filed his Complaint.
2. On May 29, 2014, Defendants filed their Motion to Dismiss the Complaint Pursuant to Fed. R. Civ. P. 12(b)(6) (the “Motion to Dismiss”).
3. On June 20, 2014, Plaintiff filed his Opposition to the Motion to Dismiss (the “Opposition”). Defendants would appreciate an opportunity to address the contentions and allegations made therein. Further, a reply brief would assist the Court in resolving the Motion to

Dismiss, as it will respond to arguments made in the Opposition, and demonstrate why the Complaint should be dismissed.

4. Oral argument has not yet been scheduled. Granting leave to file a reply to the Opposition, therefore, will not prejudice either party.

5. Counsel for Plaintiff does not object to the filing of this Motion.

WHEREFORE, Defendants respectfully request that the Court grant it leave to file a reply to the Opposition by June 30, 2014.

Respectfully submitted,

GLENN BECK, THEBLAZE INC., MERCURY
RADIO ARTS, INC., and PREMIERE RADIO
NETWORKS, INC.,

By their attorneys,

/s/ Zachary C. Kleinsasser

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hac vice pending)

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Dated: June 23, 2014

LOCAL RULE 7.1 CERTIFICATE

Pursuant to Local Rule 7.1, the parties met and conferred on June 23, 2014. Plaintiff does not object to the filing of this Motion.

/s/ Zachary C. Kleinsasser

CERTIFICATE OF SERVICE

I, Zachary C. Kleinsasser, hereby certify that on June 23, 2014 this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies will be sent to those indicated as non-registered participants.

/s/ Zachary C. Kleinsasser